IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

C. W., Minor, by Nina Gray, Next of Friend,	)	
Plaintiff,	)	Cause No. 17SL-CC00968
vs.	)	Division No. 2
WALGREEN CO. d/b/a Walgreen Store #2971,	)	
Defendant.	)	

ENTRY OF APPEARANCE

COME NOW David Ellington and Edward W. Zeidler II, of Brown & James, P.C., and hereby enter their appearance on behalf of Defendant Walgreen Co.

Edward W. Zeidler, II #56638
David P. Ellington #36109
BROWN & JAMES, P.C.
800 Market Street, Suite 1100
St. Louis, Missouri 63101-2501
(314) 421-3400
(314) 421-3128 – Fax
dellington@bjpc.com
ezeidler@bjpc.com

Attorneys for Defendant
Walgreen Co.

CERTIFICATE OF SERVICE AND
CERTIFICATE OF COMPLIANCE WITH RULE 55.03(a)

I hereby certify that a copy of the foregoing pleading was served by the Court's electronic filing system on this 10 day of May, 2017, on Mr. Nashad Carrington, Attorney for Plaintiff, Law Offices of Christopher Bent, LLC, 2200 West Port Plaza Drive, Suite 309, St. Louis, MO 63146.

In addition, the undersigned counsel certifies under Rule 55.03(a) of the Missouri Rules of Civil Procedure that he/she has signed the original of this Certificate and the foregoing pleading.

EXHIBIT
tabbies
B

Edward W. Zeidler, II #56638
David P. Ellington #36109
BROWN & JAMES, P.C.
800 Market Street, Suite 1100
St. Louis, Missouri 63101-2501
(314) 421-3400
(314) 421-3128 – Fax
dellington@bjpc.com
ezeidler@bjpc.com

Attorneys for Defendant
Walgreen Co.

ank
5/10/17
13630145

IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: MAURA B MCSHANE	Case Number: 17SL-CC00968
Plaintiff/Petitioner: C W vs.	Plaintiff's/Petitioner's Attorney/Address CHRISTOPHER BAXTER BENT 2200 WEST PORT PLAZA DRIVE SUITE 309 ST LOUIS, MO 63146
Defendant/Respondent: WALGREEN CO. DBA: WALGREEN STORE #2971	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: WALGREEN CO.
Alias:
DBA: WALGREEN STORE #2971

THE PRENTICE-HALL CORPORATION SYSTEM, INC.
221 BOLIVAR STREET
JEFFERSON CITY, MO 65101

COURT SEAL OF

ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739 or TTY at 314-615-4567, at least three business days in advance of the court proceeding.

05-APR-2017
Date

[signature]
Clerk

Further Information:
AMH

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with ______ a person of the Defendant's/Respondent's family over the age of 15 years.

☒ (for service on a corporation) delivering a copy of the summons and a copy of the petition to The Prentice-Hall Corp. System Inc Lauren Shipley (name) designee (title).

☐ other ______

Served at 221 Bolivar St. Jefferson City, MO 65101 (address)

in Cole (County/City of St. Louis), MO, on 04/10/17 (date) at 2:36 pm (time).

DAVID M. ROBERTS
Printed Name of Sheriff or Server

[signature]
Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on 4-10-17 (date).

My commission expires: 12-4-20
Date

[signature]
Notary Public

PATRICIA J. ROBERTS
Notary Public-Notary Seal
STATE OF MISSOURI-County of Cole
Commission #12481691
My Commission Expires Dec. 4, 2020

CENTRAL MISSOURI PROCESS SERVERS

A DIVISION OF

DMR INVESTIGATIONS, LLC

-Serving the Legal and Financial Professions Since 1985-

PROCESS SERVICE INVOICE

Invoice Date: 04/10/17

Client:: The Law Offices of Christopher Bent Attn: NASHA D

Address: 2200 West Port Plaza Dr. Ste. 309 City: St. Louis St./MO Zip: 63146

Service Upon: WALGREEN Co (c/o Prentice-Hall)

Plaintiff: W Defendant: WALGREEN

Date Served: 04/10/17 Case # MSL-CC00968 Acct. #: ______

Court: ST-Louis County Court Date: ______

-COMMENTS-

1 Serves/Non Est in JEFF CITY @$ 45 per Paper...$ 45.00

Serves/Non Est in ______ @$ ______ per Paper ..

Serves/Non Est in ______ @$ ______ per Paper ..

Expedited (**Rush**) Service @ $35 additional per paper.............................

Our check advanced for witness fees, etc...

Other ______......

Other ______......

INVOICE TOTAL..................$ 45.00

Tax ID # 01-0790516

Please make check payable to: **DMR Investigations, LLC**

620-B EAST HIGH STREET - JEFFERSON CITY, MO 65101
tel: 573.634.7200 - fax: 573.634.6183 - E-MAIL: DMRINV@AOL.COM

IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: MAURA B MCSHANE	**Case Number: 17SL-CC00968**
Plaintiff/Petitioner: C W vs.	Plaintiff's/Petitioner's Attorney/Address CHRISTOPHER BAXTER BENT 2200 WEST PORT PLAZA DRIVE SUITE 309 ST LOUIS, MO 63146
Defendant/Respondent: WALGREEN CO. DBA: WALGREEN STORE #2971	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: WALGREEN CO.
Alias:
DBA: WALGREEN STORE #2971

THE PRENTICE-HALL CORPORATION SYSTEM, INC.
221 BOLIVAR STREET
JEFFERSON CITY, MO 65101

COURT SEAL OF

ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739 or TTY at 314-615-4567, at least three business days in advance of the court proceeding.

05-APR-2017
Date

Clerk

Further Information:
AMH

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with ______________________ a person of the Defendant's/Respondent's family over the age of 15 years.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

______________________ (name) ______________________ (title).

☐ other ______________________.

Served at ______________________ (address)

in ______________ (County/City of St. Louis), MO, on ______________ (date) at ______________ (time).

______________________ Printed Name of Sheriff or Server

______________________ Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on ______________________ (date).

(Seal)

My commission expires: ______________ Date ______________ Notary Public

Sheriff's Fees, if applicable

Summons	$__________
Non Est	$__________
Sheriff's Deputy Salary	
Supplemental Surcharge	$ 10.00
Mileage	$__________ (_____ miles @ $._____ per mile)
Total	$__________

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

Twenty First Judicial Circuit

NOTICE OF ALTERNATIVE DISPUTE RESOLUTION SERVICES

Purpose of Notice

As a party to a lawsuit in this court, you have the right to have a judge or jury decide your case. However, most lawsuits are settled by the parties before a trial takes place. This is often true even when the parties initially believe that settlement is not possible. A settlement reduces the expense and inconvenience of litigation. It also eliminates any uncertainty about the results of a trial.

Alternative dispute resolution services and procedures are available that may help the parties settle their lawsuit faster and at less cost. Often such services are most effective in reducing costs if used early in the course of a lawsuit. Your attorney can aid you in deciding whether and when such services would be helpful in your case.

Your Rights and Obligations in Court Are Not Affected By This Notice

You may decide to use an alternative dispute resolution procedure if the other parties to your case agree to do so. In some circumstances, a judge of this court may refer your case to an alternative dispute resolution procedure described below. These procedures are not a substitute for the services of a lawyer and consultation with a lawyer is recommended. Because you are a party to a lawsuit, you have obligations and deadlines which must be followed whether you use an alternative dispute resolution procedure or not. **IF YOU HAVE BEEN SERVED WITH A PETITION, YOU MUST FILE A RESPONSE ON TIME TO AVOID THE RISK OF DEFAULT JUDGMENT, WHETHER OR NOT YOU CHOOSE TO PURSUE AN ALTERNATIVE DISPUTE RESOLUTION PROCEDURE.**

Alternative Dispute Resolution Procedures

There are several procedures designed to help parties settle lawsuits. Most of these procedures involve the services of a neutral third party, often referred to as the "neutral," who is trained in dispute resolution and is not partial to any party. The services are provided by individuals and organizations who may charge a fee for this help. Some of the recognized alternative dispute resolutions procedures are:

(1) Advisory Arbitration: A procedure in which a neutral person or persons (typically one person or a panel of three persons) hears both sides and decides the case. The arbitrator's decision is not binding and simply serves to guide the parties in trying to settle their lawsuit. An arbitration is typically less formal than a trial, is usually shorter, and may be conducted in a private setting at a time mutually agreeable to the parties. The parties, by agreement, may select the arbitrator(s) and determine the rules under which the arbitration will be conducted.

(2) Mediation: A process in which a neutral third party facilitates communication between the parties to promote settlement. An effective mediator may offer solutions that have not been considered by the parties or their lawyers. A mediator may not impose his or her own judgment on the issues for that of the parties.

CCADM73

(3) Early Neutral Evaluation ("ENE"): A process designed to bring the parties to the litigation and their counsel together in the early pretrial period to present case summaries before and receive a non-binding assessment from an experienced neutral evaluator. The objective is to promote early and meaningful communication concerning disputes, enabling parties to plan their cases effectively and assess realistically the relative strengths and weaknesses of their positions. While this confidential environment provides an opportunity to negotiate a resolution, immediate settlement is not the primary purpose of this process.

(4) Mini-Trial: A process in which each party and their counsel present their case before a selected representative for each party and a neutral third party, to define the issues and develop a basis for realistic settlement negotiations. The neutral third party may issue an advisory opinion regarding the merits of the case. The advisory opinion is not binding.

(5) Summary Jury Trial: A summary jury trial is a non binding, informal settlement process in which jurors hear abbreviated case presentations. A judge or neutral presides over the hearing, but there are no witnesses and the rules of evidence are relaxed. After the "trial", the jurors retire to deliberate and then deliver an advisory verdict. The verdict then becomes the starting point for settlement negotiations among the parties.

Selecting an Alternative Dispute Resolution Procedure and a Neutral

If the parties agree to use an alternative dispute resolution procedure, they must decide what type of procedure to use and the identity of the neutral. As a public service, the St. Louis County Circuit Clerk maintains a list of persons who are available to serve as neutrals. The list contains the names of individuals who have met qualifications established by the Missouri Supreme Court and have asked to be on the list. The Circuit Clerk also has Neutral Qualifications Forms on file. These forms have been submitted by the neutrals on the list and provide information on their background and expertise. They also indicate the types of alternative dispute resolution services each neutral provides.

A copy of the list may be obtained by request in person and in writing to: Circuit Clerk, Office of Dispute Resolution Services, 7900 Carondelet Avenue, 5th Floor, Clayton, Missouri 63105. The Neutral Qualifications Forms will also be made available for inspection upon request to the Circuit Clerk.

The List and Neutral Qualification Forms are provided only as a convenience to the parties in selecting a neutral. The court cannot advise you on legal matters and can only provide you with the List and Forms. You should ask your lawyer for further information.

CCADM73

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

C W , Minor
By Nina Grey, Next Friend

Plaintiff

v.

WALGREEN CO.
d/b/a Walgreen Store #2971

Case No.: **17SL-CC00968**
Division: **2**

APPLICATION FOR APPOINTMENT OF NEXT FRIEND AND ORDER

Nina Gray states to the Court that she is the natural mother of C W ; that C W is a minor, under the age of eighteen (18); that C W 's address is the same as his mother's, in St. Louis County, Missouri; that C W has no legally appointed guardian; and that C W desires to commence and prosecute a suit for damages against Defendant Walgreen, Co., d/b/a/ Walgreen Store #2971 for on incident occurring in December 2015.

WHEREFORE, Nina Gray, as the natural mother of, and on behalf of C W , pursuant to Rule 52.02, petitions the Court for an Order appointing her as the Next Friend of C W age 15, for purposes of the above-described action.

Nina S Gray
NINA GRAY

STATE OF MISSOURI)
) **SS**
COUNTY OF ST. LOUIS)

Nina Gray, being duly sworn upon her oath, states that she is the named Petitioner in the foregoing Application for Appointment of Next Friend and Order; that the facts presented in the application are true to the best of her knowledge and belief; and that she executed the application for the purposes stated herein.

Nina J. Gray
NINA GRAY

Subscribed and sworn to before me on this 28 day of March, 2017.

Sherard Gray
NOTARY PUBLIC

My Commission Expires:

SHERARD K. GRAY
Notary Public - State of Missouri
Commission Expires April 6, 2019
St. Louis County
Commission #15634281

I, the notary public whose signature appears above, certify that I am not an attorney representing either party to this agreement.

Sherard Gray
Notary Public Signature

ORDER

It is hereby ordered that Nina Gray is appointed Next Friend of C W , a minor, for the purposes stated in the application.

SO ORDERED:
Maura B McShane
Judge Division 2

April 03, 2017

____
Date

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

C W , Minor **By Nina Gray, Next Friend** Plaintiff v. **WALGREEN CO.** **d/b/a Walgreen Store #2971**	)))))))))))	Case No.: **17SL-CC00968** Division: **2**

CONSENT TO ACT AS NEXT FRIEND

I, Nina Gray, natural mother of C W , hereby consent to be appointed Next Friend of C W , a minor, for purposes of commencing and pursuing the above-captioned action in the St. Louis County Circuit Court.

Nina J. Gray
NINA GRAY

Subscribed and sworn to before me on this 28 day of March, 2017.

Sherard Gray
NOTARY PUBLIC

My Commission Expires:

SHERARD K. GRAY
Notary Public - State of Missouri
My Commission Expires April 6, 2019
St. Louis County
Commission #15634281

I, the notary public whose signature appears above, certify that I am not an attorney representing either party to this agreement.

Sherard Gray
Notary Public Signature

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

C W, Minor
By Nina Grey, Next Friend

Plaintiff

v.

WALGREEN CO.
d/b/a Walgreen Store #2971

Case No.: **17SL-CC00968**
Division: **2**

APPLICATION FOR APPOINTMENT OF NEXT FRIEND AND ORDER

Nina Gray states to the Court that she is the natural mother of C W ; that C W is a minor, under the age of eighteen (18); that C W 's address is the same as his mother's, in St. Louis County, Missouri; that C W has no legally appointed guardian; and that C W desires to commence and prosecute a suit for damages against Defendant Walgreen, Co., d/b/a/ Walgreen Store #2971 for on incident occurring in December 2015.

WHEREFORE, Nina Gray, as the natural mother of, and on behalf of C W , pursuant to Rule 52.02, petitions the Court for an Order appointing her as the Next Friend of C W , age 15, for purposes of the above-described action.

Nina S. Gray
NINA GRAY

STATE OF MISSOURI)
) **SS**
COUNTY OF ST. LOUIS)

Nina Gray, being duly sworn upon her oath, states that she is the named Petitioner in the foregoing Application for Appointment of Next Friend and Order; that the facts presented in the application are true to the best of her knowledge and belief; and that she executed the application for the purposes stated herein.

NINA GRAY

Subscribed and sworn to before me on this 28 day of March, 2017.

NOTARY PUBLIC

My Commission Expires:

SHERARD K. GRAY
Notary Public - State of Missouri
Commission Expires April 6, 2019
St. Louis County
Commission #15634281

I, the notary public whose signature appears above, certify that I am not an attorney representing either party to this agreement.

Notary Public Signature

ORDER

It is hereby ordered that Nina Gray is appointed Next Friend of C W , a minor, for the purposes stated in the application.

Circuit Court Judge
St. Louis County Circuit Court
Division 2

Date

17SL-CC00968

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

C W , Minor **By Nina Gray, Next of Friend** Plaintiff v. **WALGREEN CO.** **d/b/a Walgreen Store #2971** Defendants.	)	Case No.: Division: **JURY TRIAL DEMANDED**

Serve:

The Prentice-Hall Corporation System, Inc.
221 Bolivar Street
Jefferson City, Missouri 65101

PETITION

COMES NOW, Plaintiff C W , by and through his next friend, Nina Gray, (hereinafter, "Plaintiff") and files herewith the instant Petition for Damages stemming from an incident between Plaintiff, C W and Defendant Walgreen Co. d/b/a Walgreen Store #2971 (hereinafter, "Defendant") involving false imprisonment, assault, intentional infliction of emotional distress, and loss of enjoyment of life. In support thereof, Plaintiff states the following:

Parties, Venue, and Jurisdiction

1. Plaintiff C W was a fifteen (15) year old young African-American male, residing at all times alleged herein, in St. Louis County, Missouri.

2. Nina Gray, is the mother of Plaintiff C W , and the proper party to bring this action.

3. Defendant Walgreen Co. is a corporation organized and duly authorized to conduct business in the State of Missouri, and at all times relevant to this action, operated Walgreen Store #2971 at 2 Grandview Plaza Shopping Center, Suite A, in Florissant, Missouri.

4. Defendant previously engaged in a pattern and practice of engaging in discriminatory conduct based on race, as evidenced by a 2008 consent decree between Defendant and the U.S. Equal Employment Opportunity Commission (EEOC), resolving a class race discrimination lawsuit.

5. All acts complained of herein transpired in St. Louis County, Missouri.

6. The acts complained of herein arise under the Missouri Revised Statute, and common law tort claims.

7. Both jurisdiction and venue are proper in this Court.

8. The amount in dispute or controversy exceeds this Court's jurisdictional minimum.

Facts Common to All Counts

9. In December 2015, attempting to finish some Christmas shopping, C W and a friend entered the Walgreen located at 2 Grandview Plaza, Florissant, Missouri.

10. Once inside the store, C and his friend went down different aisles, but C decided to get a closer look at a particular holiday themed bear.

11. C reached for the bear with his right hand, and held money and a cellular phone in his left hand.

12. C put his cellular phone and money in his pocket, and suddenly without warning, two (2) Walgreen managers and two (2) Walgreen assistant managers convened on his position, confining him to his position within the aisle.

13. Immediately the Walgreen employees demanded to know what C had put down his pants, and admitted to watching him the entire time he was in the store.

14. It is clear the Walgreen employees were overly concerned about C 's presence in the location due solely to his race, and as such monitored his moves.

15. The Walgreen employees ceremoniously marched C to the front of the Walgreen store, in full view of all other shoppers, and searched him, sticking their hands inside his pockets to turn them inside-out, as well as lifting his shirt.

16. C was a recent heart transplant patient and still bore the unsightly scars that marked him as such; further, due to the transplant he was physically challenged and weakened by the medication to fight a possible rejection.

17. Walgreen employees found nothing on C that would suggest he was doing anything more than shopping, as any other person would.

18. The behavior of the Walgreen employees was appalling, offensive and discriminatory.

19. C should not have been subjected to such behavior, or accusations; in fact, no one should.

20. The accusation of the Walgreen employees to suggest that C was a thief began the string of unnecessary and unsubstantiated embarrassment.

21. The march to the front of the store continued the embarrassment as the Walgreen employees ensured that anyone entering, exiting, waiting to pay or otherwise shopping would see C being accused of theft.

22. The search of C was unreasonable, and without substantiation.

23. The Walgreen employees lifting his shirt and showing his scars not only embarrassed, but completely humiliated C .

24. A child who had been through so many operations, and just wanted to live a normal life did not deserve such treatment based on preconceived notions and prejudice.

COUNT I

False Imprisonment

Plaintiff re-alleges each of the foregoing paragraphs 1-24 as if fully stated herein.

25. There was no legal justification for the Walgreen employees to detain C in the store.

26. The act of seeing a young, African-American, man put his hand in his pocket is not sufficient to support confinement.

27. C did not want to be restrained in the store, it was against his will.

28. The detention of C was unlawful as there was no reasonable belief that he was a shoplifter.

29. Walgreen employees knew there was no sufficiency to the detainment, and that it was unlawful in nature.

30. Defendant intentionally restrained plaintiff against his will without legitimate explanation.

31. Walgreen employees acted with reckless disregard to C 's rights by racially profiling him, and falsely accusing him of shoplifting.

WHEREFORE, Plaintiff C W prays for a judgment to commiserate with the unlawful actions of Walgreen and Walgreen employees in falsely imprisoning C against his will. Plaintiff Gray prays for judgment to include embarrassment, humiliation, emotional distress, loss of enjoyment of life, and for punitive damages in an amount that will prevent Defendants from engaging in the same or similar conduct as outlined above, attorneys fees and costs, and for an amount that is fair and reasonable, along with any other such relief that is deemed just and appropriate by this Court.

COUNT II

Assault

Plaintiff re-alleges each of the foregoing paragraphs 1-31 as if fully stated herein.

32. Defendants rapidly approached C W with the intent to cause him apprehension of offensive contact.

33. C W was caught off guard by Defendant's conduct and immediately became apprehensive of offensive contact.

34. C W was understandably fearful for his safety as four (4) adults were quickly approaching him, and he was provided no meaningful avenue to avoid this offensive conduct.

35. Walgreen, and its employees, not only created a fear within C , but also used force to march him down the aisle to the front of the Walgreen store.

WHEREFORE, Plaintiff C W prays for a judgment for the assault to include recompense for humiliation, loss of enjoyment of life, and physical intrusion he suffered as a result of Defendants' actions that will prevent Defendants from engaging in the same or similar conduct as outlined above, attorneys fees and costs, and for an amount that is fair and reasonable, along with any other such relief that is deemed just and appropriate by this Court.

COUNT III

Intentional Infliction of Emotional Distress

Plaintiff re-alleges each of the foregoing paragraphs 1-35 as if fully stated herein.

36. Defendants purposefully, and recklessly, disregarded the rights of C in their suspicion, manhandling, accusations, and searching of the teen.

37. Defendants' conduct was outrageous and without justification; there was no need to intentionally embarrass a young teen in front of other patrons, by accusing him of shoplifting, publicly searching him, and lifting his shirt to reveal the painful reminders of an ongoing health condition.

38. Following the encounter at Walgreen, caused by the Defendants, C was never again comfortably able to shop in a store.

39. Whenever entering a store, C was in fear that he was being followed, and would be harassed.

40. The stress from this incident never left C, and in fact may have exacerbated his ongoing medical condition, leading to his sudden demise.

WHEREFORE, Plaintiff C W prays for a judgment for the reckless, purposeful and intentional infliction of emotional distress suffered due to the actions of the Defendants. Plaintiff Gray prays for judgment to include an appropriate amount to prevent the Defendants from engaging in the same or similar conduct as outlined above, attorneys fees and costs, and for an amount that is fair and reasonable, along with any other such relief that is deemed just and appropriate by this Court.

Respectfully Submitted,
LAW OFFICES OF CHRISTOPHER
BENT, LLC

By: /s/Christopher Bent, #45875
Nashad Carrington, #68550
2200 West Port Plaza Drive, Ste. 309
St. Louis, MO 63146
(314) 439-0287 / (314) 558-2622 (fax)